

STEWART LEE KARLIN LAW GROUP, P.C.

Daniel E. Dugan, Esq.

**111 John Street, 22nd Floor
New York, New York 10038**

(212) 792-9670/Office

(212) 732-4443/Fax

dan@stewartkarlin.com

**MEMBER OF THE BAR
NEW YORK & NEW JERSEY**

**Concentrating in Employment, Education,
Insurance and Commercial Law**

August 8, 2019

Via ECF

Honorable Steven M. Gold
United States District Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Telesford v. New York City Department of Education, et al.
16 CV 819 (CBA)(SMG)**

Dear Magistrate Judge Gold:

I am the attorney for the Plaintiff Edgar Telesford in the above-referenced action. Plaintiff writes to inform the Court that at this time the above-referenced action is unable to settle, and it is requested that the matter be referred back to Judge Amon for an additional pre-motion conference or to allow the parties to confer and submit a proposed briefing schedule to the Court for Defendant's anticipated motion for summary judgment.

On July 19, 2019 a pre-motion conference was held before Judge Amon regarding Defendant's anticipated motion for summary judgment. The parties were directed to engage in settlement negotiations and referred to Your Honor for a settlement conference. A telephone conference with Your Honor was held on July 31, 2019. Plaintiff was directed to make a renewed settlement demand by August 6, 2019, with Defendant to respond to the demand by August 13, 2019, and a settlement conference was scheduled for August 29, 2019 at 4PM.

Honorable Steven M. Gold
August 8, 2019
Page 2

Following careful consideration, Plaintiff has determined that he is unable to settle the case at this time, and a settlement conference would not be an efficient use of Court resources. Thus, Plaintiff requests that the matter proceed to Defendant's anticipated motion for summary judgment.

Thank you for your consideration of this request.

Very truly yours,

s/ Daniel E. Dugan

Daniel E. Dugan, Esq.

Stewart Lee Karlin Law Group, P.C.

CC: Mark R. Ferguson, Assistant Corp. Counsel
(Attorney for Defendants) *via ECF*